

MCDERMOTT WILL & EMERY LLP

Darren Azman
Joseph B. Evans
One Vanderbilt Avenue
New York, New York 10017-3852
Telephone: (212) 547-5400
Facsimile: (212) 547-5444

MCDERMOTT WILL & EMERY LLP

Charles R. Gibbs (admitted *pro hac vice*)
Grayson Williams (admitted *pro hac vice*)
2501 North Harwood Street, Suite 1900
Dallas, Texas 75201-1664
Telephone: (214) 295-8000
Facsimile: (972) 232-3098

MCDERMOTT WILL & EMERY LLP

Gregg Steinman (admitted *pro hac vice*)
333 SE 2nd Avenue, Suite 4500
Miami, FL 33131-2184
Telephone: (305) 329-4473
Facsimile: (305) 503-8805

Counsel to the Plan Administrator

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

VOYAGER DIGITAL HOLDINGS, INC., *et al.*,

Debtors.¹

)
) Chapter 11
)
) Case No. 22-10943 (MEW)
)
) (Jointly Administered)
)
)
) **Re: ECF No. 1588**
)

**CERTIFICATE OF NO OBJECTION REGARDING
THE PLAN ADMINISTRATOR'S SECOND OMNIBUS OBJECTION TO
CERTAIN FILED PROOFS OF CLAIM**

Pursuant to 28 U.S.C. § 1746, Rule 9075-2 of the Local Bankruptcy Rules for the Southern District of New York (the “Local Bankruptcy Rules”), and in accordance with the *Notice of Hearing Regarding The Plan Administrator’s Second Omnibus Objection to Certain Filed Proofs of Claim* [Docket No. 1588] (the “Notice of Hearing”), the undersigned counsel for Paul R. Hage, in his capacity as the Plan Administrator (the “Plan Administrator”) for the *Third Amended Joint Plan of Voyager Digital Holdings, Inc. and Its Debtor Affiliates Pursuant*

¹ The Wind-Down Debtors in these chapter 11 cases, along with the last four digits of each Wind-Down Debtor’s federal tax identification number, are: Voyager Digital Holdings, Inc. (7687); Voyager Digital Ltd. (7224); and Voyager Digital, LLC (8013). The service address for purposes of these chapter 11 cases is 27777 Franklin, Suite 2500, Southfield, MI 48034.

to Chapter 11 of the Bankruptcy Code [Docket No. 1166-1] of Voyager Digital Holdings, Inc., et al. (collectively, the “Wind-Down Debtors”), hereby certifies as follows:

1. On September 22, 2023, the Plan Administrator filed *The Plan Administrator’s Second Omnibus Objection to Certain Filed Proofs of Claim* [Docket No. 1588] (the “Omnibus Objection”).

2. On October 27, 2023, the Plan Administrator filed the *Notice of Filing of Amended Schedule Relating to the Plan Administrator’s Second Omnibus Objection to Certain Filed Proofs of Claim* [Docket No. 1605], amending Schedule 4 to the proposed order attached to the Omnibus Objection to delete the sole objected-to claim listed on Schedule 4. The Proposed Order (as defined herein) attached hereto reflects the fact that the Plan Administrator is no longer seeking any relief with respect to Schedule 4.

3. The Notice of Hearing and Omnibus Objection, as well as a Customized Notice of Objection to Proof of Claim directed to each Claimant holding a Disputed Claim² (collectively, the “Customized Notices”), were served by the Plan Administrator’s Claims and Noticing Agent, Stretto Inc., as reflected in the *Affidavit of Service* filed at Docket No. 1596.

4. Pursuant to the Notice of Hearing and the Customized Notices, the deadline for parties to file responses to the Omnibus Objection was October 25, 2023 at 4:00 p.m. (prevailing Eastern Time) (the “Response Deadline”).

5. Local Rule 9075-2 provides that the Omnibus Objection may be granted without a hearing if (a) no objections or other responsive pleadings have been filed on or before the applicable objection/response deadline and (b) the entities that filed the Omnibus Objection comply with such rule.

² All capitalized terms used but not otherwise defined herein shall have the meaning ascribed to them in the Omnibus Objection.

6. As of the filing of this certificate, more than forty-eight (48) hours have elapsed since the Response Deadline, and the undersigned counsel to the Plan Administrator hereby certifies that as of the date hereof, no objection or other response to the Omnibus Objection has been filed or served pursuant to the Notice of Hearing or the Customized Notices.

7. Accordingly, the undersigned counsel requests entry of the proposed order attached hereto as **Exhibit A** (the “Proposed Order”) at the Court’s earliest convenience.

8. If not entered prior to the hearing, the Plan Administrator will seek entry of the proposed order at the telephonic-only hearing scheduled for 11:00 a.m., prevailing Eastern Time, on November 1, 2023, before the Honorable Michael E. Wiles, United States Bankruptcy Judge, United States Bankruptcy Court for the Southern District of New York.

Dated: New York, New York
October 27, 2023

MCDERMOTT WILL & EMERY LLP

/s/ Darren Azman

Darren Azman
Joseph B. Evans
One Vanderbilt Avenue
New York, NY 10017-3852
Telephone: (212) 547-5400
Facsimile: (212) 547-5444
E-mail: dazman@mwe.com
E-mail: jbevans@mwe.com

and

Charles R. Gibbs (admitted *pro hac vice*)
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2501 North Harwood Street, Suite 1900
Dallas, TX 75201
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Facsimile: (972) 232-3098
E-mail: crgibbs@mwe.com
E-mail: gwilliams@mwe.com

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Administrator*